

Jeffrey S. Pagliuca (*pro hac vice*)  
HADDON, MORGAN AND FOREMAN, P.C.  
150 East 10<sup>th</sup> Avenue  
Denver, CO 80203  
Phone: 303.831.7364  
Fax: 303.832.2628  
jpagliuca@hmflaw.com

Denise D. Riley (# 160245)  
Riley Law PLLC  
2710 Del Prado Blvd. S., Unit 2-246,  
Cape Coral, FL 33904  
Phone: 303.907.0075  
denise@rileylawpl.com

*Attorneys for Ghislaine Maxwell*

---

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

---

In re: SUBPOENA TO BRADLEY J.  
EDWARDS

Underlying case:

VIRGINIA L. GIUFFRE, Plaintiff

v.

GHISLAINE MAXWELL, Defendant

No. 15-cv-07433-RWS (S.D.N.Y.)

**MOTION TO FILE CERTAIN EXHIBITS  
UNDER SEAL**

Case Number 0:16-mc-61262-JEM

Defendant Ghislaine Maxwell pursuant to Rule 5.4 (b) of the Local Rules of the U.S. District Court for the Southern District of Florida, requests permission to file exhibits A, G, H, I, and N, attached to the Declaration of Jeffrey S. Pagliuca In Support of Defendant Ghislaine Maxwell's Response In Opposition of Motion of Bradley J. Edwards Motion to Quash Subpoena or, in the Alternative, for a Protective Order, under seal for the following reason:

1. Exhibits A, G, H, I, and N have been designated CONFIDENTIAL pursuant to a protective order issued by the U.S. District Court in the Southern District of New York in the underlying matter, *Giuffre v. Maxwell*, 15-cv-07433-RWS.
2. Under the terms of the protective order documents designated confidential may not be shared publicly.
3. Ms. Maxwell requests that the exhibits be permanently sealed.

Dated June 29, 2016

Respectfully submitted,

/s/ Jeffrey S. Pagliuca

Jeffrey S. Pagliuca (*pro hac vice*)  
HADDON, MORGAN AND FOREMAN, P.C.  
150 East 10<sup>th</sup> Avenue  
Denver, CO 80203  
Phone: 303.831.7364  
Fax: 303.832.2628  
jpagliuca@hmflaw.com

Denise D. Riley (# 160245)  
Riley Law PLLC  
2710 Del Prado Blvd. S., Unit 2-246,  
Cape Coral, FL 33904  
Phone: 303.907.0075  
denise@rileylawpl.com

*Attorneys for Ghislaine Maxwell*

CERTIFICATE OF SERVICE

I hereby certify that on June 29, 2016, I electronically filed the foregoing *Motion to File Certain Exhibits Under Seal* with the Clerk of Court using the CM/ECF system which sent notification of such filing to the following:

Jack Scarola  
Searcy Denney Scarola Barnhart &  
Shipley, P.A.  
2139 Palm Beach Lakes Boulevard  
West Palm Beach, Florida 34409  
Phone: 561-686-6300  
Fax : 561-383-9451  
jsx@searcylaw.com  
mep@searcylaw.com  
Attorneys for Plaintiff Bradley J.  
Edwards

/s/ Nicole Simmons

---